

**Federal Defenders**  
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October 29, 2020

Via ECF and E-Mail

Hon. Rachel P. Kovner  
U.S. District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Alonzo Shipp*, 19 Cr. 29 (RPK)

Dear Judge Kovner:

The defense respectfully requests to supplement our proposed voir dire and provide the Court with a list of potential witnesses and individuals that may be mentioned at trial.

List of Names

1. Defense
  - a. Alonzo Shipp (Client)
  - b. Ashley Burrell, Esq. (Defense Counsel)
  - c. Deirdre von Dornum, Esq. (Defense Counsel)
  - d. Abigail Gellman (Paralegal)
2. Case-Specific Names and Potential Witnesses
  - a. Special Agent Joanna Beck
  - b. Detective Robert Ciolino
  - c. Waleska Miller
  - d. Quahmel Myers
  - e. Seku Myers
  - f. Tislam Myers
  - g. Willie Thorton
  - h. Lisa Vasquez

Respectfully Submitted,

/s/

Ashley M. Burrell

Deirdre D. von Dornum  
Federal Defenders of New York  
Attorneys for *Alonzo Shipp*

cc: Counsel of Record (by ECF and E-Mail)